

Appendix E

**Additional Background Information
on the Bureau of Reclamation's
Cultural Resource Identification Effort**

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Most of the regulatory discussion and baseline portions of Section 3.5, "Cultural Resources," of the *Lower Colorado River Multi-Species Conservation Program Environmental Impact Statement/Environmental Impact Report* (LCR MSCP EIS/EIR), were excerpted and summarized from a longer preliminary text prepared by Reclamation. Portions of the longer text that have additional background information are provided below. For the sake of continuity, the following includes some sentences and paragraphs that are duplicated in Section 3.5. However, full sections and long passages that have been excerpted and included in Section 3.5 have been deleted from the following text.

E.1 The Identification Effort

The LCR MSCP is taking a programmatic approach to species and habitat protection and conservation. Measures outlined in the conservation plan may or may not be implemented by LCR MSCP participants over the next 50 years. Where these conservation measures may be implemented, and the specific details of each project/activity that might be undertaken by LCR MSCP participants, are not known. Given the programmatic character of the LCR MSCP, and the fact the LCR MSCP participants will be required to comply with environmental and historic preservation laws and regulations in effect at the time specific projects are planned and implemented, Reclamation determined the appropriate level of the identification effort for the LCR MSCP at this time is a Class I inventory.

In 2000, Reclamation contracted with Archaeological Consulting Services (ACS), Inc., to conduct a records search to identify known historic properties within the LCR MSCP Area of Potential Effects (APE), as defined by the conservation opportunity areas, and to prepare a Class I inventory report detailing the findings. The Class I inventory report is still in draft form, so is unavailable for public distribution at this time. When available the Class I inventory report will be submitted to the Arizona, California, and Nevada State Historic Preservation Officers (SHPOs), tribes, and other interested parties for their information and comment.

Site and project information was obtained by ACS from the following agencies and repositories: Reclamation's Lower Colorado Regional Office in Boulder City, Nevada;

the National Park Service's (NPS) Western Archaeological Conservation Center (WACC); Harry Reid Center (HRC) at the University of Nevada Las Vegas; Arizona State Museum (ASM); the Arizona SHPO; and the Eastern Information Center, the San Bernardino Archaeological Information Center, and the Southeast Information Center in Riverside, Redlands, and Ocotillo, California, respectively. ACS also contacted the Bureau of Land Management (BLM) offices in Arizona and California responsible for management of lands within the LCR MSCP APE, the NPS Lake Mead National Recreation Area office in Boulder City, Nevada, and the Service's Southwestern Regional Office in Albuquerque, New Mexico, to determine if they held information concerning projects and sites that may not yet have been entered into state repository files. As a part of the records search, ACS was also directed to examine Government Land Office (GLO) township survey plats on file at BLM state offices in Arizona, California, and Nevada.

All project and GLO resource data received from the above cited sources were entered into Access databases developed specifically for this project. Site data was entered into a version of Reclamation's regional site database. All project, GLO resource, and site spatial data were digitized and linked to the Access databases to allow the information to be manipulated and displayed using geographic information systems (GIS) ArcView/ArcInfo software.

E.2 Previously Recorded Sites within and Adjacent to the LCR MSCP APE: General Observations

As noted above, the Class I inventory report is currently in draft form, and thus is unavailable for distribution at this time. Although project and site data are still in the process of being evaluated, preliminary examination of these data has brought to light various problems that will need to be taken into consideration as the analyses proceed, as well as some general trends with respect to the locations of sites within and adjacent to the LCR MSCP APE. These are presented here and form the basis for the effects analyses presented in Section 3.5 of the LCR MSCP EIS/EIR.

A majority of the site data received from the various repositories contacted during the records search is best considered "legacy data." Legacy data is here defined as information collected by professionals and amateurs that, in general, do not meet current Federal, state, or professional standards for site recording. Early site forms (if the information is on a form at all) tend to lack detailed descriptions of the site setting, the kinds of features and artifacts present and their relationships to each other, the probable period of occupation of the site, sketch maps, photographs, etc. Following the establishment of state historic preservation offices in the 1970s, use of standardized site recording forms became more common, although site descriptive information still tends to be sketchy and there generally is no assessment of a site's potential for listing on the National Register of Historic Places (NRHP). Following passage of the 1982 amendments to the National Historic Preservation Act (NHPA), use of standardized site recording forms became the norm. More detailed descriptive information is required, and forms often contain a section for the recorder's recommendation with respect to the eligibility of the resource for potential listing on the NRHP. However, justifications as to

why the resource may or may not be eligible for listing are often lacking. Although the NPS issued guidance in the 1970s recommending sites be evaluated for potential listing on the NRHP within the framework of an historic context, evaluating eligibility with reference to all the NRHP criteria and providing eligibility justifications citing historic themes, specific research questions and data requirements in the body of reports and on site forms did not become common practice until the mid-1990s. As a result, the NRHP eligibility status of many of the sites in the LCR MSCP database is not known. Even in those cases where the recorder included an eligibility recommendation on the site form or in the body of the report, there is no indication in repository records whether or not the federal agency, and subsequently the SHPO or the Keeper of the Register, concurred with the recommendation. As a result, there is no way to state with any certainty how many sites located within or in proximity to the LCR MSCP APE have been found eligible or potentially eligible for listing on the NRHP.

The criteria used to define what is and what is not a site have changed through time. In the early days of section 106 compliance surveys, scatters of 2–3 artifacts were often recorded as sites and assigned permanent state site numbers. Today, such scatters would be considered isolated occurrences and would not be entered into repository records with permanent site numbers. To determine how many sites listed in the LCR MSCP database might actually be isolated artifacts or isolated occurrences would be prohibitively time consuming; thus, for the purpose of this analysis it is assumed all resources listed in the database represent sites, with the following exception which is easily recognized in the records. Apparently at some point in the past, staff at the Southeast Information Center obtained copies of GLO surveyors' notes used to construct GLO township plats for lands in Imperial County. Using these notes, repository staff seem to have plotted a point on more recent U.S. Geological Survey (USGS) 7.5' quadrangles where GLO surveyors indicated a cultural feature such as a road, trail, ditch, etc., intersected a township grid line. A permanent site number was then assigned to the point and a site form was filled out (typically these resources are cursorily described with a single phrase presumably from the surveyor's notes stating something like: "cross trail bearing north and south"). There is nothing in the site records for these resources to suggest any field reconnaissance has ever been performed to confirm the presence of physical remains of cultural features at the plotted locations. As a result, these "sites," like the GLO resources discussed above, are best viewed as being suggestive of the kinds of historic features that might be present within the LCR MSCP APE.

A total of 822 previously recorded sites appear in the LCR MSCP site database (Table 3.5-2 in Section 3.5 of the LCR MSCP EIS/EIR). If sites for which no data are available and Imperial County GLO point plot data are eliminated, the total number of sites falls to 755. The actual number of sites present is even somewhat lower than this. Many of the sites in the Lake Mojave and Lake Mojave 0.25 Mile Buffer conservation opportunity areas were recorded by Baldwin (1943, 1948) prior to construction of Davis Dam. Field observations made by Reclamation and NPS cultural program staff to several sites recorded by Baldwin indicate he assigned separate site status to individual features within larger sites. If one treats Baldwin's site clusters as single sites, rather than several individual sites as they appear in the record, the number of sites in the Lake Mojave 0.25 Mile Buffer conservation opportunity area is reduced from 128 to 47, thus decreasing the total number of sites in the LCR MSCP APE as a whole to 674.

E.3 References Cited

Baldwin, Gordon C. 1943. *Archaeological Survey of the Davis Dam Reservoir Area*. Master on file at the National Park Service, Lake Mead National Recreation Area office. Boulder City, Nevada.

Baldwin, Gordon C. 1948. *Archaeological Surveys and Excavations in the Davis Dam Area*. Master on file at the National Park Service, Lake Mead National Recreation Area office. Boulder City, Nevada.